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The Mentholatum Co., Inc.

707 Sterling Drive • Orchard Park, New York 14127 • Tel. (716) 677-2500 • Fax. (716) 674-3696
www.mentholatum.com

Submitted by Fax

October 28, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: October 14, 2003 Comments to Docket No. 78N-0301; External Analgesic Drug Products for Over-the-Counter Human Use; Reopening of the Administrative Record and Amendment of Tentative Final Monograph

Dear Sir or Madam:

We wish to assure FDA that The Mentholatum Company does not claim any privilege for anything in the material submitted on October 14, 2003. This information is considered part of the public docket.

Sincerely,

Joyce L. Miller

Joyce L. Miller
Director, Regulatory Affairs

The Mentholatum Co., Inc.

707 Sterling Drive
Orchard Park, NY 14127-1587
716-677-2500 • 800-688-7660
Fax: 716-675-2783

FAX TRANSMITTAL

DATE: October 28, 2003

TO: Latroy Tinch
Dockets Management Branch
Food and Drug Administration
301-827-6868

FAX: 301-827-6870

FROM: Joyce L. Miller
Director, Regulatory Affairs
Ext. 1572

TOTAL PAGES: 2

In response to your telephone contact, please see attached letter regarding The Mentholatum Company's comments to Docket No. 78N-0301 on October 14, 2003.

Consumer Product Testing Co.

EST. 1975

FINAL REPORT

CLIENT: Rohto-Mentholatum
Research Laboratories, Inc.
111 Rock Road
Horsham, Pennsylvania 19044

ATTENTION: Meryl Reis

TEST: Repeated Insult Patch Test
Protocol No.: 1.01

TEST MATERIAL: DH Cream R10-005A

EXPERIMENT REFERENCE NUMBER: C99-0836.02

Richard R. Eisenberg, M.D.
Board Certified Dermatologist

Kathleen Alworth, B.A.
Director of Quality Assurance

Robert W. Shanahan, Ph.D.
Principal Investigator

Joy Frank, R.N.
Study Director

70 New Dutch Lane • Fairfield, New Jersey 07004-2514 • (973) 808-7111 • Fax (973) 808-7234

Consumer Product Testing Co.
EST. 1975

QUALITY ASSURANCE UNIT STATEMENT

Study No.: C99-0836.02

The objective of the Quality Assurance Unit (QAU) is to monitor the conduct and reporting of clinical laboratory studies. These studies have been performed with strict adherence to the Good Laboratory Practice Act (21 CFR 50, 56, 58) and in accordance to standard operating procedures and applicable standard protocols. The study is listed on this facility's Master Schedule. The QAU maintains copies of study protocols and standard operating procedures and has inspected this study on the date(s) listed below. The findings of these inspections have been reported to management and the Study Director. All materials and data pertinent to this study will be stored in the Archive Facility at 70 New Dutch Lane, Fairfield, New Jersey, 07004, unless specified otherwise, in writing by the Sponsor.

Dates of biophase/data inspections:

September 1, 1999	October 4, 1999
September 8, 1999	October 25, 1999
September 10, 1999	October 27, 1999
September 20, 1999	

Professional personnel involved:

Joy Frank, R.N.	-	Executive Vice President Clinical Evaluations
Robert W. Shanahan, Ph.D.	-	Vice President, Technology
Johanna Erdmann	-	Clinical Laboratory Supervisor
OnChi Cheung, B.S.	-	Quality Assurance Associate

The representative signature of the Quality Assurance Unit on the front page signifies that this study has been performed in accordance with standard operating procedures and study protocol as well as government regulations regarding such procedures and protocols as outlined in the Federal Register (Vol. 46, No. 17 of Tuesday, January 27, 1981).

Objective: To determine by repetitive epidermal contact the potential of a test material to induce primary or cumulative irritation and/or allergic contact sensitization.

Participants: Fifty-six (56) qualified subjects, male and female, ranging in age from 20 to 75 years, were selected for this evaluation. Fifty (50) subjects completed this study. The remaining subjects discontinued their participation for various reasons, none of which were related to the application of the test material.

Inclusion Criteria:

a. Male and female subjects, age 16[a] and over.
b. Absence of any visible skin disease which might be confused with a skin reaction from the test material.
c. Prohibition of use of topical or systemic steroids and/or antihistamines for at least seven days prior to study initiation.
d. Completion of a Medical History form and the understanding and signing of an Informed Consent form.
e. Considered reliable and capable of following directions.

Exclusion Criteria:

a. Ill health.
b. Under a doctor's care or taking medication(s) which could influence the outcome of the study.
c. Females must not be pregnant or nursing.
d. A history of adverse reactions to cosmetics or other personal care products.

Test Material: DH Cream R10-005A

Study Schedule:

Panel #	Initiation Date	Proposed Completion Date	Actual Completion Date
19990509	September 13, 1999	October 15, 1999	October 21, 1999

Methodology: The upper back between the scapulae served as the treatment area. Approximately 0.2 g of the test material, or an amount sufficient to cover the contact surface, was applied to the 1" x 1" absorbent pad portion of a clear adhesive dressing*. This was then applied to the appropriate treatment site to form a semi-occluded patch.

[a]With parental or guardian consent
*Manufactured by TruMed Technologies, Inc., Burnsville, MN

Methodology (continued):

Induction Phase:

Patches were applied three (3) times per week (e.g., Monday, Wednesday, and Friday) for a total of nine (9) applications. The site was marked to ensure the continuity of patch application. Following supervised removal and scoring of the first Induction patch, participants were instructed to remove all subsequent Induction patches at home, twenty-four hours after application. The evaluation of this site was made again just prior to re-application. If a participant was unable to report for an assigned test day, one (1) makeup day was permitted. This day was added to the Induction period.

With the exception of the first supervised Induction Patch reading, if any test site exhibited a moderate (2-level) reaction during the Induction Phase, application was moved to an adjacent area. Applications are discontinued for the remainder of this test phase, if a moderate (2-level) reaction was observed on this new test site. Applications would also be discontinued if marked (3-level) or severe (4-level) reactivity was noted.

Rest periods consisted of twenty-four hours following each Tuesday and Thursday removal, and forty-eight hours following each Saturday removal.

Challenge Phase:

Approximately two (2) weeks after the final Induction patch application, a Challenge patch was applied to a virgin test site adjacent to the original Induction patch site, following the same procedure described for Induction. The patch was removed and the site scored at the clinic twenty-four and seventy-two hours post-application.

Evaluation Key:

0 = No visible skin reaction
+ = Barely perceptible or spotty erythema
1 = Mild erythema covering most of the test site
2 = Moderate erythema, possible presence of mild edema
3 = Marked erythema, possible edema
4 = Severe erythema, possible edema, vesiculation, bullae and/or ulceration

Results:

The results of each participant are appended (Table 1).

Barely perceptible (+) to mild (1-level) skin reactivity was observed on numerous subjects during the Induction and Challenge test phases. These type of responses are consistent with similar topical analgesic formulations evaluated under repetitive, semi-occlusive patch conditions.

Summary: Under the conditions of this study, test material, DH Cream R10-005A, did not indicate a clinically significant potential for dermal irritation or allergic contact sensitization.

Table 1
Panel #19990509

Individual Results

DH Cream R10-005A

Subject Number	24*hr	Induction Phase 1	2	3	4	5	6	7	8	9	Virgin Challenge Site 24*hr	72 hr	
1	+	+	0	0	0	0	0	0	0	0	0	0	
2	0	0	0	0	0	0	0	0	0	0	0	0	
3	0	0	0	0	0	0	0	0	0	0	0	0	
4	0	0	0	0	0	0	0	0	0	0	0	0	
5	0	0	0	0	0	0	0	0	0	0	0	0	
6	0	0	0	0	0	0	0	0	0	0	0	0	
7	0	0	0[W]	0	0	0	0	0	0	0	0	0	
8	0	0	0	0	0	0	0	0	0	0	0	0	
9	0	0	0	0	0	0	0	+	+	0	0	0	
10	0	0	0	0	0	0	0	0	0	0	0	0	
11	0	0	0	0	0	0	0	0	0	0	0	0	
12	+	0	0	0	0	0	0	0	0	0	0	0	
13	0	0	0	0	0	0	0	0	0	0	0	0	
14	0	0	0	0	0	0	0	0	0	0	0	0	
15	0	0	0	0	0	0	0	0	0	0	0	0	
16	0	0	0	0	0	0	0	0	0	0	0	0	
17	0	0	0[W]	0	0	0	0	0	0	0	0	0	
18	0	0	0	0	0	0	0	0	0	0	+	+	+*
19	0	0	0	0	0	0	0	0	0	0	0	0	
20	0	0	0	0	0	0	0	0	0	0	0	0	
21	0	0	0	0	+	+	+	0[D]	0[D]	0	+	0	
22	0	0	0	0	0	0	0	0	0	0	0	0	
23	0	0	0	0	0	0	0	0	0	0	0	0	
24	0	0[W]	0	0	0	0	0	0	0	0	0	0	
25	0	0	0	DID NOT COMPLETE STUDY									
26	1	0	0	0	0	0	0	0	0	0	0	0	
27	0	0	DID NOT COMPLETE STUDY										
28	0	0	0	0	0[m]	0	0	0	0	0	0	0	

24* = Supervised removal of 1st Induction and Challenge Patch
* = 96 hour follow-up evaluation
m = Additional makeup day granted at the discretion of the clinic supervisor
W = Inclement weather, observation rescheduled

Table 1
(continued)
Panel #19990509

Individual Results

DH Cream R10-005A

Subject Number	Induction Phase 24*hr	1	2	3	4	5	6	7	8	9	Virgin Challenge Site 24*hr	72 hr
29	0	0	0	0	0	0	0	0	0	0	0	0
30	0	0	0[W]	0	0	0	0	0	0	0	0	0
31	**1**	0	0	0	0	0	0	0	0	0	0	0
32	0	0	0	0	0	0	0	0	+	+	0	0
33	0	0	----------DID NOT COMPLETE STUDY----------									
34	0	0	0[W]	0	0	0	0	0	0	0	0	0
35	0	----------DID NOT COMPLETE STUDY----------										
36	0	0	0	0	0	0	0	0	0	0	0	0
37	0	0	0	0	0	0	0	0	0	0	0	0
38	0	0	0	0	0	0	0	0	0	0	0	0
39	0	0	0	0	0	0	0	0	0	0	0	0
40	0	0	0	0	0	0	0	0	0	0	0	0
41	+	0	0	0	0	0	0	0	0	0	0	0
42	0	0	0[W]	0	0	0	0	0	0	0	0	0
43	0	0	0	----------DID NOT COMPLETE STUDY----------								
44	0	0	0	0	0	0	0	+	+	+	0	0
45	0	0	0	0	0	0	0	0	0	0	0	0
46	0	0	0	0	0	0	0	0	0	0	0	0
47	0	0	0	0	0	0	0	0	0	0	0	0
48	0	0	0	0	0	0	0	0	0	0	0	0
49	0	0	0	0	0	0	0	0	0	0	0	0
50	0	0	0	0	0	+	0	0	0	0	0	0
51	+	0	+	0	0	0	0	0	0	0	**1**	0
52	0	0	0	0	0	+	0	+	+	+	0	0
53	----------DID NOT COMPLETE STUDY----------											
54	0	0	0	0	0	0	0	0	0	0	0	0
55	+	0	0[W]	0	0	0	0	0	0	0	0	0
56	0	0	0	0	0	0	0	0	0	0	0	0

24* = Supervised removal of 1st Induction and Challenge Patch
W = Inclement weather, observation rescheduled

Table 2
Panel #19990509

Subject Data

Subject Number	Initials	Age	Sex
1	VT	75	F
2	AF	55	F
3	CG	37	F
4	MP	33	M
5	NP	28	F
6	CM	26	M
7	VL	43	F
8	LB	38	F
9	JJ	43	M
10	HM	51	M
11	MS	65	F
12	TD	24	F
13	RA	67	F
14	TT	25	F
15	MB	73	F
16	DA	53	F
17	CL	43	F
18	ES	36	F
19	SC	21	F
20	BC	37	F
21	PF	38	F
22	BM	39	F
23	JK	50	F
24	WM	31	F
25	BK	45	F
26	RA	27	F
27	AA	51	M
28	LG	36	F

Table 2
(continued)
Panel #19990509

Subject Data

Subject Number	Initials	Age	Sex
29	JD	59	F
30	TS	27	F
31	SH	32	F
32	SM	23	F
33	VP	36	F
34	BN	25	F
35	HC	58	F
36	SK	42	F
37	LC	49	F
38	TR	62	F
39	GO	29	M
40	RT	53	F
41	RB	37	M
42	AS	20	F
43	MG	42	F
44	SG	25	F
45	JB	57	F
46	PD	64	F
47	JM	54	F
48	LR	65	F
49	PL	69	F
50	AH	61	F
51	BM	59	F
52	GR	47	M
53	DK	45	F
54	KR	42	F
55	JM	21	F
56	ES	68	M